

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, THE  
EMPLOYEES RETIREMENT SYSTEM OF THE  
GOVERNMENT OF THE COMMONWEALTH OF  
PUERTO RICO, AND THE PUERTO RICO PUBLIC  
BUILDINGS AUTHORITY,

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

Debtors.<sup>1</sup>

**STATEMENT OF THE MEDIATION TEAM REGARDING  
EFFORTS TO REACH CONSENSUAL PLAN OF ADJUSTMENT**

The Mediation Team appointed in the Title III Cases provides the following statement in response to the Court’s remarks during the June 16, 2021 omnibus hearing (the “Omnibus Hearing”) regarding the need for parties to make “good faith best efforts” to resolve outstanding disputes before solicitation of the Title III plan of adjustment of the Commonwealth, ERS, and PBA.

1. Since the Omnibus Hearing, the Mediation Team has been in communication with all mediation parties who objected to approval of the *Disclosure Statement for the Third*

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations). The Title III cases commenced by the Commonwealth, COFINA, HTA, ERS, PREPA, and PBA are referred to herein as the “Title III Cases.”

*Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* [ECF No. 16741].<sup>2</sup> Based on these communications, the limited time available, and its own assessment of the Title III Cases, the Mediation Team prioritized resolution of certain disputes and directed the relevant parties to engage with each other.

2. By this Statement, the Mediation Team confirms that all parties it directed to engage with each other between the Omnibus Hearing and the filing of this Statement made “good faith best efforts,” as the Court used that term during the Omnibus Hearing.

Dated: July 13, 2021

Respectfully submitted,

/s/ Barbara J. Houser  
Honorable Barbara J. Houser  
United States Bankruptcy Court  
for the Northern District of Texas  
Mediation Team Leader

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<sup>2</sup> All ECF numbers refer to filings in the Commonwealth’s Title III Case, No. 17 BK 3283-LTS.